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**Attorneys for DEFENDANTS KRISTIAN GOURLAY
and THE KNG GROUP, LLC**

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF HAWAII

In re) CASE NO. No. 16-01294
) (Chapter 7)
ROLLOFFS HAWAII, LLC,)
)
Debtor.)
)
)
)
)
)
)
DANE S. FIELD, Chapter 7 Trustee)
for the Estate of Rolloffs Hawaii,)
LLC,)
)
Plaintiff,)
)
)
v.)
)
TRASHMASTERS, LLC;)
CORRIDOR CAPITAL LLC;)
CORRIDOR CAPITAL ADVISORS,)
LLC; CORRIDOR)
TRASHMASTERS, L.P.; SPB)
MANAGEMENT, LLC; SPB)

WASTE, LLC; SPB CAPITAL GP,) Adv. Pro. No. 18-90035
LLC; SPB CAPITAL PARTNERS,)
L.P.; SPB PARTNERS, LLC; CRAIG)
ENENSTEIN; L. GEOFFREY) **DEFENDANT KRISTIAN**
GREULICH; EDWARD A.) **GORLAY AND THE KNG GROUP,**
MONNIER; JESSAMYN DAVIS;) **LLC'S JOINDER IN**
ARI D. BASS; SCOTT R.) **TRASHMASTERS, LLC;**
BULLOCH; KENNETH M.) **CORRIDOR CAPITAL, LLC;**
PRESSBERG; KRISTIAN) **CORRIDOR CAPITAL ADVISORS,**
GORLAY; DOUGLAS L. ASAY;) **LLC; CORRIDOR**
DOUGLAS D. ASAY; CHARLES E.) **TRASHMASTERS, L.P.; SPB**
LEONARD; BRIAN COLBECK;) **MANAGEMENT, LLC; SPB WASTE,**
ROLLOFFS HAWAII, INC.; THE) **LLC; SPB CAPITAL GP, LLC; SPB**
KNG GROUP, LLC; COLBECK) **CAPITAL PARTNERS, L.P.; SPB**
CONSULTING LLC; JOHN DOES) **PARTNERS, LLC; CRAIG**
1-50; JANE DOES 1-50; DOE) **ENENSTEIN; L. GEOFFREY**
CORPORATIONS 1-50; DOE) **GREULICH; EDWARD A.**
PARTNERSHIPS 1-50; DOE) **MONNIER; JESSAMYN DAVIS; ARI**
ENTITIES 1-50,) **D. BASS; SCOTT R. BULLOCH AND**
Defendants) **KENNETH M. PRESSBERG'S**
) **MOTION TO DISMISS**
) **COMPLAINT**
)
)
) Related Dkt. No. 19

**DEFENDANT KRISTIAN GORLAY AND THE KNG GROUP, LLC'S
JOINDER IN TRASHMASTERS, LLC; CORRIDOR CAPITAL, LLC;
CORRIDOR CAPITAL ADVISORS, LLC; CORRIDOR TRASHMASTERS,
L.P.; SPB MANAGEMENT, LLC; SPB WASTE, LLC; SPB CAPITAL GP,
LLC; SPB CAPITAL PARTNERS, L.P.; SPB PARTNERS, LLC; CRAIG
ENENSTEIN; L. GEOFFREY GREULICH; EDWARD A. MONNIER;
JESSAMYN DAVIS; ARI D. BASS; SCOTT R. BULLOCH AND KENNETH
M. PRESSBERG'S MOTION TO DISMISS COMPLAINT**

Pursuant to Rule 12(b)(6) and Rule 18 of the Federal Rules of Civil Procedure,
made applicable to adversary proceedings by Rule 7012 and Rule 7018 of the Federal
Rules of Bankruptcy Procedure, DEFENDANTS KRISTIAN GORLAY

("Gourlay") and THE KNG GROUP, LLC ("KNG")(together "Defendants KNG"), by and through their counsel, Case Lombardi & Pettit, A Law Corporation, hereby join in defendants TrashMasters, LLC; Corridor Capital, LLC; Corridor Capital Advisors, LLC; Corridor TrashMasters, L.P.; SPB Management, LLC; SPB Waste, LLC; SPB Capital GP, LLC; SPB Capital Partners, L.P.; SPB Partners, LLC; Craig Enenstein; L. Geoffrey Greulich; Edward A. Monnier; Jessamyn Davis; Ari D. Bass; Scott R. Bulloch and Kenneth M. Pressberg ("Movants") Motion to Dismiss Complaint ("Motion") filed February 15, 2019 (Dkt # 19).

Defendants KNG are entitled to dismissal all claims and allegations against them for all the reasons and cited authorities cited in the Motion, especially all claims related to the KNG Payoff (Counts XLV – LI) and all remaining claims barred by the statute of limitations.

Defendants reserve the right to file a Reply and other supplemental pleadings concerning the Motion.

DATED: Honolulu, Hawaii, March 4, 2019.

/s/ TED N. PETTIT

TED N. PETTIT

ELLEN A. SWICK

Attorneys for **DEFENDANTS**
KRISTIAN GOURLAY and THE
KNG GROUP, LLC